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CC: Jackie Takakura, Kurt Wollenhaupt



FROM: Prof. Dick Mayer

RE: **Ho'onani Village Draft-EIS**

5-May-2026

I sincerely appreciate being able to provide information to help improve the Draft-EIS so that it will be better able to accurately indicate potential impacts and clarify needed mitigation steps.

INTRODUCTION The Draft-EIS for this project has major flaws that should make it unacceptable to be accepted as a Final-EIS. The problems are serious and demand that a more comprehensive study be done for certain very specific impacts and mitigation measures.

A. A major concern regarding the Draft-EIS relates to its proposed location **below the low-level flight-path of airplanes landing and occasionally taking off from Kahului airport**. The impacts are multiple and they have not been properly disclosed in the Draft-EIS, **even in the recent 2026 Appendix Q update**. Furthermore, the environmental impacts of the proposed mitigation measures themselves are totally ignored. These issues alone are so serious as to place the entire project in a “do not build”, “do not land-reclassify” status. Most significantly, many of the households would have young children whose sleep would be disturbed multiple times every single night.

B. A second concern relates to the **actual need for this project** given the analysis done by the Maui Planning Department on the projected needs for additional housing in Central Maui. The Department showed that there are already numerous other approved and proposed housing projects to supply the needs for Central Maui housing.

C. A third concern, given the landowner’s **desire to build outside the Maui Island Plan Urban Growth Boundary and on land left out of the Wailuku-Kahului Community Plan’s “Urban” designation**. There is a need to evaluate alternative uses of this property to best meet the land-use needs of the community with minimal negative impacts. Agriculture could be continuing use, and if urbanized, industrial uses may be appropriate.

D. A fourth, and also a major concern, is the **potential unreliability of the project’s potable water supply**.

E. A final concern regards the location of this project **far away from needed supporting infrastructure**, in particular: schools, parks and recreational facilities, etc. The Draft-EIS avoids any discussion of the dangers imposed on the hundreds of children living in Ho’oani Village by the major highways that need to be crossed in order to get to/from schools, parks and recreation facilities.

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A. KAHULUI AIRPORT, NOISE DISRUPTIONS, and MITIGATION WEAKNESSES

The location for these residences is terrible for one very significant reason. **The 1,608 housing units would lie directly under the flight path of planes landing at Kahului Airport.**

Ho'onani Village lies directly under the flight path leading into Kahului Airport. Many planes land and then take off late at night after 10:00 p.m. Most of these late flights come from the West Coast and Canada. After landing late at night, they take off about an hour and a half later, with several freight planes arriving nightly between 1am and 5am. These planes would be extremely disturbing to the several thousand residents in these 1,608 units. The aircraft are only about 200 feet above the proposed multi-story apartments. Even worse, about 10% to 20% of the time (during Kona weather) those houses would be under the even noisier, take-off flight path from the airport. More significantly, many of the households would have young children whose sleep would be disturbed multiple times every single night. **Each of us should ask: a) Would we like to live there? and b) Is it responsible and morally appropriate for us to place 1,608 households and the 5,000 resident neighbors in that location?**

This particular land parcel with its proximity to Kahului Airport, Hawaii's 2nd busiest, has a history that reflects considerable concern by earlier planners regarding a **need to prevent future housing from being located on this particular parcel** because the low-level flight path over this proposed project would cause real problems, particularly with noise. There are also safety concerns, potential fumes, and other environmental impacts.



There is a history of this particular land parcel's location that dates back to the time when both the 2002 Wailuku-Kahului (Central Maui) Community Plan, and the 2012 Maui Island Plan were being prepared by the community and approved by the County Council. Both plans recommended NO residential development in this location. The Community Plan recognized this land parcel's proximity to the airport and intentionally kept this land out of urban use. The Maui Island Plan established very specific Urban Growth Boundaries to exclude a development such as the one now being proposed.

The Ho'onani Village site was discussed and it was specifically NOT included within the future Urban Growth Boundaries because of its location. For the State Land Use Commission or the Maui County Council to now include this property within the UBC, it would have to be able to show that the reasons for excluding this land parcel from the Urban Growth Boundaries is justified by new findings. The Draft-EIS does not do this!

Draft-EIS noise study in Appendix Q in the third volume (PDF Pages 3-62)

Unfortunately, the Draft-EIS has neglected to do a proper analysis of the noise levels, particularly during night-time, sleeping hours. The Draft-EIS totally underestimates the real-life, episodic impacts of the low-level flights directly over the proposed residential project.

In addition, the discussion of the mitigation measures avoids any discussion of the serious subsequent impacts that will result from those recommended actions. The proposed mitigation measures have their own impacts and they need to be properly assessed and discussed in the Final-EIS.

Appendix Q. Examines three kinds of noise: noise from airplanes, noise from passing vehicles, and on-site construction noise. My comments deal strictly with the type of noise from the airplanes.

Unfortunately, there are several problems with the Draft-EIS Appendix Q in Volume 3:

a) The three diagrams on PDF Pages 27, 28 and 29 represent some project on Oahu and do not represent the Ho'onani noise levels.

b) The authors of Appendix Q made absolutely no measurements of sound while an airplane is actually flying overhead. This is totally negligent, and yet extremely relevant, to the impacts on the approximately 5,000 people who will be living in the Ho'onani Village project.

c) The whole Appendix Q study examines **average noise levels** and does not properly describe the short-duration, high-dB level type of noise impacts that will be coming from planes flying at low elevation right over the housing units, especially during the night. For example, two planes flying overhead during the 3:00 a.m. to 4:00 a.m. hour may be extremely loud for two minutes each, and for someone sleeping it could be most disturbing. The average for the whole hour may be quite low, but every night those two instances of flights coming over will seriously disturb sleeping. And there are many more sleep-time flights.

Appendix Q makes no mention of these high impulse sounds and only uses averages; consequently, sleep disruption impacts on thousands of babies, school-children, and workers is being grossly underestimated in this Draft-EIS.

d) For those not used to using the decibel level measuring standard of “dB”, they may not realize that the scale is logarithmic. In other words, a dB level of 65 is actually 100 times louder than a level of 45.

e) The entire, important Appendix Q should be required to be resampled with particular attention to airplane noise during the night when numerous flights come into Kahului airport after normal sleeping hours. Maximum noise levels should be indicated. The number of disturbances and dB levels should be presented; night time “averages” should NOT be used.

f) There are **problems with the recommended mitigation measures** to baffle the noise. It is essential to include a discussion of the significant impacts on the residents from those recommended mitigation measures.

Appendix Q recommends that the mitigation measures include all windows being double paned and keeping them closed while maintaining constant air-conditioning in every one of the 1,608 housing units. This is just to reduce the impacts from the airplane noise.

If those Draft-EIS proposed mitigation measures are taken, it will result in at least two serious negative impacts on the residents of this community:

1. **No fresh air** in any of the apartments ever. This could cause serious health problems and those health problems need to be discussed and analyzed.

Living in a space without fresh air exchange can lead to "Sick Building Syndrome," where indoor pollutants like CO₂, VOCs, and dust mites accumulate. Without ventilation, stale air can cause headaches, fatigue, and irritation of the eyes, nose, and throat. Standard air conditioning units primarily recycle and cool existing air rather than introducing outside air. This lack of circulation often results in:

- **Low Humidity:** AC removes moisture, which can dry out your skin, mucous membranes, and nasal passages, potentially making a person more susceptible to respiratory infections.
- **Contaminant Buildup:** In tightly sealed environments, allergens and mold spores can concentrate, worsening asthma or allergies.
- **Cognitive Impact:** High CO₂ levels in poorly ventilated rooms are linked to decreased concentration and decision-making performance.

2. A second consequence of the recommended noise- mitigation measures will mean **very high electricity bills to keep the air-conditioning system on at all times**. Residents are all being selected for these units because of their need for affordable housing. There should be careful consideration given as to whether the costs of air conditioning will make these units unaffordable. The electricity cost issue is particularly relevant because there will be many residents who are not just seeking affordable housing, but are at the very lowest income level. It is almost certain that they will not be able to afford Maui's electricity costs which are approximately three to four times higher than electricity costs on the US mainland.

IMPORTANT: The Final-EIS must also include the detailed impacts (Fresh-air deprivation and high-electricity costs) resulting from its recommended mitigation measures.

B. PROJECT JUSTIFICATION Is there an actual need for this project given the analysis done by the Maui Planning Department on the projected needs for additional housing in Central Maui? The Planning Department showed in a [January 13, 2026 Staff Report](#) (PDF pages 20+21) to the Maui Planning Commission that

there are already numerous other approved and proposed housing projects to supply the needs for Central Maui housing. **With so many housing units in the pipe-line, why is a change in land-use necessary?**

Approved or anticipated housing projects in the Wailuku-Kahului CP Area:

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| Kahului Civic Center | 300 units approximately |
| Maui Lani remaining entitlements | 608 homes (further review needed) |
| DHHL Wailuku Single Family Residential | 173 homes plus 31 lots |
| DHHL Pu'uhona (Wailuku) | 171 homes |
| DHHL (Waiehu Mauka) | 343 homes and 55 rural lots |
| Waikapū Country Town | 1,433 residential units plus 146 'ohana |
| Waikapū Development Venture | 80 homes |
| Waihe'e Affordable Housing | 752 units |
| Hale Pilina (Puunene Ave, Kahului) | 178 apartments |
| Estimated Total | 4,069 |

The **Staff Report** indicated two other large projects that could provide needed housing: "Missing from this list are Queen Ka'ahumanu Center and Kahului Shopping Center which have significant potential for mixed use transit-oriented development but have not proposed plans yet."

The **Planning Department Staff Report** went on to say that there were only an additional 695 units needed and implied that the Ho'onani 1,608 units would be excessive!

"The Central Maui Community Plan Update Housing Resource Paper December 2024 provides some updated projections for Central Maui based on UHERO forecasts. It states, "Assuming UHERO's baseline population estimate, there will be a need for additional housing units to accommodate the population increase. As of 2022, there were an estimated 19,440 total housing units in Central Maui. If the average household size and vacancy rate for Central Maui remain constant over the 20-year period, the baseline forecast population growth would translate to a need for about 20,135 housing units by 2043. **This represents an increase of roughly 695 units relative to the existing housing unit count.**"

- C. ALTERNATIVE USES OF THIS LAND** Given the landowner's desire to build outside the Maui Island Plan Urban Growth Boundary and on land left out of the **Wailuku-Kahului Community Plan's "Urban" designations**, there is a need to evaluate alternative uses of this property to best meet the land-use needs of the community with minimal negative impacts.

Agriculture could be a continuing use. If urbanized, industrial uses may be much more appropriate. Agriculture and industrial land uses would not be so severely impacted by the low flying airplanes. They operate during the day-time and sleep would not be disturbed.

- D. POTENTIAL UNRELIABILITY OF THE PROJECT'S POTABLE WATER SUPPLY** There is a need to provide considerably more information on this project's water source. The Draft-EIS indicates that a single well will be utilized because the County's water system is inadequate or unavailable.

The proposed single well is located far off-site. At this stage it has an uncertain capacity to produce the water needed. It is also located in the middle of the lands which formerly were intensively utilized for a sugar plantation that used large amounts of fertilizers and chemicals. Previous studies of water in Central Maui have shown high chemical residues. What dangerous residues remain below in this water source?

Furthermore, the entire project is in a precarious position because if the pump in the well breaks down, or if there is some other problem with the well's water source, **there is no backup** for the 5,000 residents who would be living in this project. This is a serious matter and there is no Plan B at this time being proposed. Even if the County Department of Water Supply were to eventually take over this well, the problem that there is no backup to a single well dependency would not disappear.

E. DISTANT FROM NEEDED SUPPORTING INFRASTRUCTURE

There are no nearby schools, and the parks and recreational facilities are inadequate. This is important because the Draft-EIS avoids any discussion of the dangers imposed on the hundreds of children living in Ho'onani Village by the major highways that would need to be crossed in order to get to/from schools, parks and recreation facilities.